

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 20-13293

v.

HON. David M. Lawson

INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA,

Defendant.

_____ /

**UNITED STATES' MOTION FOR WITHDRAWAL
OF ATTORNEY AND SUPPORTING BRIEF**

The United States of America has been represented in this matter by the undersigned Assistant United States Attorney (AUSA) Steven Cares. AUSAs Erin Shaw and John Neal are also familiar with the case, have recently entered their appearances, and will continue the case as the assigned AUSAs representing the interests of the United States.

Recently, undersigned counsel, accepted a position outside of the U.S. Attorney's Office and, starting June 10, 2024, will no longer be an AUSA. Undersigned counsel therefore respectfully moves this Court for an Order withdrawing him as attorney for the United States.

Before filing, undersigned counsel provided a draft of this motion and brief

to opposing counsel seeking concurrence, who agreed to the relief sought in the motion. For the reasons and on the grounds more fully discussed in the brief below, the United States requests that the Court grant its motion.

BRIEF

QUESTION PRESENTED

Should the Court Enter an Order for Withdrawal of Attorney for the United States, where an Attorney on Record as Representing the United States will be leaving the United States Attorney's Office for Another Position?

MOST APPROPRIATE AUTHORITY

E.D. Mich. LR 83.25(b)(2)

After a years-long government investigation, the government and the International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (“UAW”) reached an agreement to resolve civil and criminal liability of the UAW through a proposed Consent Decree. The parties jointly moved for the entry of that decree, which this Court granted. The Consent Decree was entered by the Court on January 29, 2021. (ECF No. 9, PageID.107).

The United States was originally represented in this matter by undersigned Assistant United States Attorney (AUSA) Steven Cares. AUSAs Erin Shaw and John Neal are also familiar with the case, have recently entered their appearances, and will continue the case as the assigned AUSAs representing the interests of the United States.

E.D. Mich. LR 83.25(b)(2) indicates “An attorney may withdraw or be substituted for only on order of the court.”

In view of undersigned counsel's upcoming departure from the U.S. Attorney's Office, the United States is seeking an Order withdrawing him as attorney for the United States in this case.

Respectfully submitted,

DAWN N. ISON
United States Attorney

s/ Steven P. Cares
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Assistant United States Attorney
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Dated: June 6, 2024

Certificate of Service

I hereby certify that on June 6, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the ECF participants in this case.

s/ Steven P. Cares

Steven P. Cares

Assistant United States Attorney